

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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Xiamin Zeng

Plaintiff,

against

John Chell et al.

Defendant.
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CIVIL ACTION NO.: 19-cv-3218

PROPOSED CASE MANAGEMENT PLAN FOR PRO SE CASE

1. Summary of Claims, Defenses, and Relevant Issues.

Plaintiff/Defendant (circle one)

Plaintiff seeks claims from violation of civil rights by confined for 26 hours; physical injuries including dizzy spells and fainting; emotional injuries including PTSD, personal injuries including loss of income/ inability to work as a result of PTSD and other afflictions, transportation and administrative costs for medical conditions and legal proceedings.

\$500,000 (five hundred thousand dollars) or an appropriate amount to be determined by the court.

2. I understand my obligation to and am preserving relevant information.

Plaintiff/Defendant (circle one)

3. Proposed Schedule

All discovery should be completed by 7/17/2020

- a. Depositions: Depositions shall be completed by 6/11/2020
- b. Neither party may take more than 2 depositions. Absent an agreement between the parties or an order from the Court, non-party depositions shall follow initial party depositions.

- c. Initial Requests for Documents must be made by 6/26/2020.
- d. Responses to Requests for Documents must be made by 7/8/2020.
- e. Documents from third-parties (such as doctors) will/will not (circle one) be required. If required, the following are the third-parties from whom Documents will be requested.

Wylie Stecklow Past SDNY FBA President; Jacob Gerber Attorney for King & Spalding; Aides for Congresswoman Nydia Vasquez; Jennifer Martinez Case Manager at Safe Horizon; Deborah Altman Assistant Director of NYCHA HR and Israel Levin Esq. for Local 237.

- f. Subpoenas requesting Documents from third-parties must be served by 7/17/2020. Documents obtained from third-parties must be provided to all parties in this matter.
- g. There will/will not (circle one) be expert testimony in this case. If expert testimony will be needed, please describe the topic on which the expert(s) is expected to testify
Mr. Levin and Ms. Altman for NYCHA were tainted witnesses directly involved in the persecution of Plaintiff that led to this case. Several others all of whom had assisted and witnessed in Plaintiff's cases.

4. Early Settlement or Resolution

The parties have/have not (circle one) discussed the possibility of settlement. The parties request a settlement conference by no later than 7/29/2020. The following information is needed before settlement can be discussed:

Defendants immediately stopped and continued to injure Plaintiff in all respects.

Defendants deliberately stopped Plaintiff's child support since January 2020. Plaintiff learned from SSA that ACS provided false information again causing Plaintiff and child to lose financial during this difficult period of Covid-19.

5. Other Matters

Plaintiff(s)/Defendant(s) (circle one) wish to discuss the following additional matters at the Initial Case Management Conference.

Defendants provide all of records who have been prosecuted at work.

Defendants have abused power and retaliating against Plaintiff and her family in all.

Respectfully submitted this 9th day of April.

XIAMIN ZENG

Name

110 COLUMBIA ST APT 1A
NEW YORK NY 10002

Address

929-250-4690

Phone number

amyzane77@gmail.com

Email

Party representing (if applicable)

